

Doreen Spears Hartwell, Esq.
 Nevada State Bar No. 7525
 Laura Thalacker, Esq.
 Nevada State Bar No. 5522
 HARTWELL THALACKER, LTD
 11920 Southern Highlands Pkwy, Suite 201
 Las Vegas, Nevada 89141
 Phone: (702) 850-1074; Fax: (702) 508-9551
 doreen@HartwellThalacker.com
 laura@HartwellThalacker.com
 Attorneys for Defendants
 OTIS ELEVATOR COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRODERICK SINCLAIR, individually,

Plaintiff,

vs.

OTIS ELEVATOR COMPANY, ROBERT
 LINDLEY, STEVE BURGER, ZACHARY
 CHRISTIANSEN, STEVEN SPERB, KEVIN
 HANSON, JANE NGUYEN, AND PAUL
 HENTZ; DOES I through X; and ROE
 CORPORATIONS I through X, inclusive,

Defendants.

Case No.: 2:22-cv-02065-GMN-EJY

**UNOPPOSED MOTION TO
 EXTEND TIME TO ANSWER OR
 OTHERWISE PLEAD TO
 PLAINTIFF'S AMENDED
 COMPLAINT**

(FIRST REQUEST)

Defendants Otis Elevator Company ("Otis"), Robert Lindley ("Lindley"), Zachary Christiansen ("Christiansen"), Steven Sperb ("Sperb"), Kevin Hanson ("Hanson"), Jane Nguyen ("Nguyen"), and Paul Hentz ("Hentz") (collectively "Defendants") by and through their attorneys, and pursuant to LR IA 6-1, respectfully moves this Court to extend the deadline for them to answer or otherwise respond to Plaintiff's Amended Complaint (Doc. 50) filed on March 1, 2023. In support of this motion, Otis Worldwide states as follows:

1. Plaintiff filed his Complaint in the District of Nevada on December 13, 2022.
2. Otis served its Answer to the Complaint on February 17, 2023.

1 3. Defendants Lindley, Sperb, Hanson, Nguyen and Hentz executed waivers of
2 service and were scheduled to answer or otherwise respond to the Complaint on March 6, 2023.

3 4. Defendant Christiansen was served on January 25, 2023, and received an extension
4 of time to answer or otherwise respond to the Complaint until March 6, 2023 (Doc. 42).

5 5. On March 1, 2023, Plaintiff filed his Amended Complaint (Doc. 50).

6 6. Defendants' responses are presently due March 15, 2023.

7 7. Counsel managing the day-to-day matters of this litigation is presently scheduled
8 to be out of the country from March 10, 2023, through March 16, 2023. As such, Defendants
9 request a one-week extension of the March 15, 2023, deadline to March 22, 2023, to file their
10 answers or otherwise respond to the newly filed Amended Complaint (Doc. 50).

11 8 Defense counsel contacted opposing counsel on March 7, 2023, to request this
12 extension of time and Plaintiff does not object to this extension.

13 9. This is Defendant's first request for an extension of time to answer or otherwise
14 respond to Plaintiff's Amended Complaint.

15 10. This request is made in good faith and not for the purposes of unwarranted delay or
16 for any other improper purpose.

17 *****REMAINDER OF PAGE INTENTIONALLY LEFT BLANK*****
18
19
20
21
22
23
24
25
26
27
28

Based on the foregoing, Otis, Lindley, Christiansen, Sperb, Hanson, Nguyen, and Hentz respectfully request that the Court enter an order granting them an extension of time until March 22, 2023, in which to answer or otherwise respond to Plaintiff's Amended Complaint.

Dated: March 9, 2023.

Respectfully Submitted,

/s/Doreen Spears Hartwell

Doreen Spears Hartwell
Hartwell Thalacker, LTD

Attorneys for Defendant
Otis Worldwide Corporation

IT IS SO ORDERED.

DATED: March 9, 2023.


UNITED STATES MAGISTRATE JUDGE